

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Eastern District of Virginia**UNDER SEAL**

United States of America)

v.)

Reza Niknejad)

Case No. 1:15mj325)

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 15, 2014 in the county of multiple in the
Eastern District of Virginia, the defendant(s) violated:*Code Section**Offense Description*

18 United States Code, §2339B

Conspiracy to provide material support and resources to designated foreign terrorist organizations

18 United States Code, §2339A

Conspiracy to provide material support and resources to terrorists

18 United States Code, §956

Conspiracy to kill and injure persons in a foreign country


This criminal complaint is based on these facts:

did unlawfully and knowingly combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to provide material support and resources, specifically, personnel, to a foreign terrorist organization, namely ISIL, knowing that ISIL was designated a terrorist organization and that the organization had engaged in and was engaging in terrorist activity and terrorism.

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

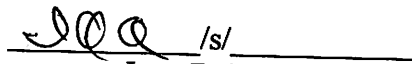
Michael P. Ben'Ary, AUSA

*Complainant's signature*

David L. Martinez, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: June 10, 2015City and state: Alexandria, VA
Ivan D. Davis
United States Magistrate Judge